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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JUN 21 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Forward-Looking Mechanism for High)	CC Docket No. 97-160
Cost Support for Non-Rural LECs)	
)	
And)	
)	
Federal State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Access Reform)	CC Docket No. 96-262
)	

MEMORANDUM IN SUPPORT

On June 15, 1999, the United States Telephone Association ("USTA") filed a request for extension of time in the above-cited dockets. Specifically, USTA has requested additional time to prepare comments regarding the implementation of the federal non-rural, high cost universal service plan.¹ Sprint Corporation ("Sprint") fully supports USTA's request and encourages the Commission to extend the filing dates for comments as described in USTA's motion.

¹ Comments in both dockets are to be filed by July 2, 1999; reply comments are due no later than July 16, 1999.

The Commission has requested participants in the Inputs FNPRM² and the Implementation FNPRM³ to present their positions on both the input values for the proxy cost model as well as on the implementation of the USF plan itself and to support all opinions expressed by cost model data. As the Commission is well aware, model runs are not accomplished on a whim. USTA affirms (at page 4) that "... the last iteration of the cost proxy model required over 200 computer hours to run, from beginning to end, using the Commission's default values. This equates to over eight days. Only after several runs of the FCC's cost proxy model could USTA members produce meaningful analyses of the model."

Sprint joins USTA in its concern regarding how, under these circumstances, it will be able to provide meaningful comments by the Commission's July 2nd deadline. Sprint will need to run the model numerous times, alternating both the input values and settings used in each run, in order to assess the reasonableness of the Commission's tentative conclusions. There are no shortcuts available in this process and it is not until this process is completed that the company can formulate its comments.

Sprint recognizes that the Commission has dedicated itself to finalizing the USF process by year's end and Sprint is committed to assisting the Commission in its efforts.

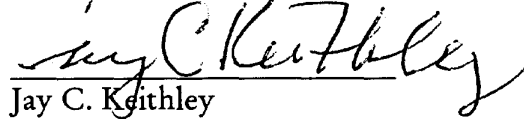
² *Federal-State Joint Board on Universal Service Forward-Looking Mechanism for High Cost Support for Non-Rural LECs*, Further notice of Proposed Rulemaking, CC Docket No. 96-45 and 97-160, FCC 99-120 (rel. May 28, 1999) ("Inputs FNPRM").

³ *Federal-State Joint Board on Universal Service Access Charge Reform*, Further Notice of Proposed Rulemaking, CC Docket Nos. 96-45 and 96-262, FCC 99-119 (rel. May 28, 1999) ("Implementation FNPRM").

However, Sprint asserts that the issues to be decided through this round of comments are too important to be rushed unnecessarily. Therefore, Sprint joins the USTA in its request for an extension of the comment period as outlined at page 3 of USTA's motion.

Respectfully submitted,

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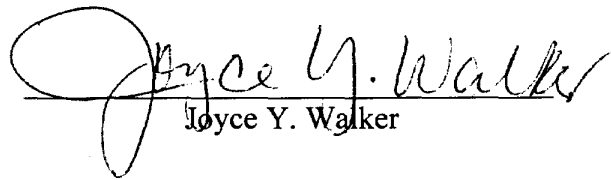
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June 21, 1999

CERTIFICATION OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 21st day of June 1999, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of Sprint Corporation's foregoing "Memorandum In Support of USTA's Request For Extension", CC Docket's 96-45, 97-160 and 96-262, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.


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June 21, 1999

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